

# Exhibit 2

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Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI, and JAKE ADAMS

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a nominal defendant; ISAAH KEE; MICHAEL BLACKWOOD; BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:*  
*Hon. Kenly K. Kato – Courtroom 1*

**AMENDED NOTICE OF TAKING  
DEPOSITION OF SALVADOR  
NAVARRO GURROLA**

Date: January 30, 2025  
Time: 10:00 a.m.  
Dept.: Via Zoom

*Trial Date: 01/13/2025*

*Complaint filed: 06/07/2022*

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**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert Vaccari and Jake Adams in the above-captioned matter will take the oral deposition of **SALVADOR NAVARRO GURROLA** This deposition is to take place on **January 30, 2025, at 10:00 a.m.** via video conference before a Certified Shorthand Reporter authorized to administer oaths in the State of California.

**NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this deposition utilizing a secure web-based deposition service or telephonically only to provide remote access for those parties wishing to participate in the deposition via the internet and/or the telephone.

**PLEASE TAKE FURTHER NOTICE** that the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent.

**PLEASE TAKE FURTHER NOTICE** that we also reserve the right to utilize instant visual display technology such that the court reporter's writing of the proceeding or pertinent exhibits will be displayed simultaneous to their writing of the same on one's laptop, iPad, tablet, or other type of display device connected to the court reporter.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of Civil Procedure Rule 30, we reserve the right to record the testimony of this deponent by sound and visual videotape technology for the purpose of using it as admissible evidence at a later proceeding, including trial.

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1 If the deponent requires an interpreter, it is requested that you advise this  
2 office at least five (5) days prior to the deposition of the language and/or dialect.

3  
4 DATED: January 21, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

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7 By: /s/Shannon L. Gustafson  
8 **SHANNON L. GUSTAFSON**  
9 **AMY R. MARGOLIES**  
10 **ANITA K. CLARKE**  
Attorneys for Defendant, Defendant  
11 COUNTY OF SAN BERNARDINO  
12 ROBERT VACCARI, and JAKE ADAMS  
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# CONFIRMATION



14661 FRANKLIN AVENUE, SUITE 150  
TUSTIN, CA 92780  
P: 800-454-1230

<b>Job No.</b>	<b>133464</b>	<b>Scheduled Date</b>	<b>1/17/2025</b>
<b>Attn</b>	<b>Gloria Pence</b>	<b>Attorney</b>	<b>Amy R. Margolies, Esq.</b>
<b>Firm</b>	<b>Lynberg &amp; Watkins</b> 1100 Town & Country Road, Suite 1450 Orange, CA 92868 Phone: 714-937-1010		

This email is being sent as confirmation of the following scheduled deposition:

<b>Style of Case</b>	<b>L.C. vs. State of California; County of San Bernardino</b>		
<b>Witness(es)</b>	<b>Salvador Navarro Gurrola</b>		
<b>Deposition Date</b>	<b>1/30/2025</b>	<b>TimePacific Standard Time</b>	<b>10:00AM - 2:00PM</b>
<b>Location</b>	<b>Zoom Room 17</b>  Zoom 17, Phone: Join as Participant <a href="https://remotecounsel.com/meetings/hZNZ5TMTfps/participant">https://remotecounsel.com/meetings/hZNZ5TMTfps/participant</a>  Password: 974011  Join via Phone Dial: 646-568-7788 Meeting ID: 912-574-58007		
<b>Services/Job Notes</b>	<b>Videographer</b>		

We will confirm this assignment the business day prior to the scheduled time.

**STANDARD CANCELTATION POLICIES.** A late cancellation fee will be charged for all assignments:

**COURT REPORTER:** AFTER 4 PM OF PRIOR BUSINESS DAY.

**INTERPRETER:** 24- BUSINESS HOURS PRIOR TO START TIME OF SCHEDULING & 72-HOURS FOR EXOTIC LANGUAGES.

**VIDEOGRAPHER:** AFTER 4 PM OF PRIOR BUSINESS DAY.

**BILLING:** The party identified above is the contracting party unless agreed to in writing prior to the rendering of services. The party and/or firm is entirely responsible for the complete payment of fees incurred as described above (except services ordered by other parties' counsel). Depositions are subject to a per diem up to \$500.00. Interpreter rates are market value and not subject to negotiation or reductions. Current rates apply to this setting.

**\*\*\*As of 02/01/23, rates for court, depositions, interpreters and videographer services have been updated. For updated rates, please respond and request from**

UNITED STATES DISTRICT COURT

for the

Central District of California

L.C. a minor et al.

Plaintiff

v.

County of San Bernardino, et al.

Defendant

Civil Action No. 5:22-cv-00949-KK-SHK

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Salvadore Navarro Gurrola 18010 Catalpa St. Hesperia, CA (951) 403-4532

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: VIA VIDEO CONFERENCE (ZOOM)

Date and Time:

01/30/2025 10:00 am

The deposition will be recorded by this method: VIA VIDEO CONFERENCE

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/17/2025

CLERK OF COURT

OR

/s/ Shannon L. Gustafson

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Defendants County of San Bernardino, et al. Shannon L. Gustafson,

Lynberg & Watkins, 1100 W. Town & County Rd, #1450, Orange, CA 92868 (714) 937-1010 sgustafson@lynberg.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 5:22-cv-00949-KK-SHK

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_ *Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**

**(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
  - (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
  - (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On January 21, 2025 I served the foregoing document(s) described as **DEFENDANTS' AMENDED NOTICE OF TAKING DEPOSITION OF SALVADOR NAVARRO GURROLA & SUBPOENA** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Dale K. Galipo, Esq. Hang D. Le, Esq. LAW OFFICES OF DALE K. GALIPO 21800 Burbank Boulevard, Suite 310 Woodland Hills, California 91367 Tele: (818) 347-3333 Fax: (818) 347-4118 Email: <a href="mailto:dalekgalipo@yahoo.com">dalekgalipo@yahoo.com</a> Email: <a href="mailto:hlee@galipolaw.com">hlee@galipolaw.com</a> Email: <a href="mailto:SLaurel@galipolaw.com">SLaurel@galipolaw.com</a> – Litigation Secretary	Attorney for Plaintiffs, L.C., I.H., A.L., and ANTONIA SALAS UBALDO
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Diana Esquivel Deputy Attorney General TORT & CONDEMNATION SECTION Office of the Attorney General Tel: (916) 210-7320 Fax: (916) 322-8288 Email: <a href="mailto:Diana.Esquivel@doj.ca.gov">Diana.Esquivel@doj.ca.gov</a>	Attorney for Defendants STATE OF CALIFORNIA by and through California Highway Patrol and Michael Blackwood
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**BY E-SERVE:** The above listed document(s) were electronically served via the USDC Central District's CM/ECF system and the Notice of Electronic Filing (NEF) indicates the registered party and/or attorney were served with the above documents.

**X BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct. Executed on January 21, 2025 at Orange, California.

/s/ Gloria Pence